

Alina Veneziano  
NV Bar No. 16645  
Oberheiden, P.C.  
625 S. 6th Street  
Suite #301  
Las Vegas, NV 89101  
(702) 209-7570 - alina@federal-lawyer.com

**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

FEDERAL TRADE COMMISSION AND  
STATE OF NEVADA

Plaintiffs,

vs.

INTERNATIONAL MARKETS LIVE, INC., et  
al.,

Defendants.

Case No.: 2:25-cv-00760-CDS-NJK

PLAINTIFFS' AND DEFENDANT ALEX  
MORTON'S STIPULATION TO EXTEND  
DEADLINE (SECOND REQUEST)

**STIPULATION TO EXTEND DEADLINE**

IT IS HEREBY STIPULATED by and among the parties hereto, Defendant Alex Morton and Plaintiffs Federal Trade Commission and State of Nevada (collectively, the "Parties"), by and through their respective counsel of record, that Morton's deadlines to file and serve his answer, or to otherwise respond, to the Complaint (Dkt 1) is extended until Monday, July 7, 2025. Defendant Morton's deadline to respond to the Complaint is June 23, 2025. The Parties are actively working towards a final resolution of this matter and the additional time to respond will allow both Parties to dedicate their time and resources to the resolution effort. The Parties have previously filed one request to extend Defendant Morton's time to file an answer or otherwise respond to Plaintiffs' Complaint, and this is the second stipulation for an extension of time for Morton to file his answer or otherwise respond to Plaintiff's Complaint. This stipulation is made in good faith and not for purposes of improper delay.

IT IS SO ORDERED.

Dated: June 24, 2025

STIPULATION TO EXTEND DEADLINE

  
\_\_\_\_\_  
Nancy J. Koppe  
United States Magistrate Judge

1 IT IS SO STIPULATED

2 DATED: June 23, 2025

3 /s/ Thomas M. Biesty

4 Thomas M. Biesty

5 Laura C. Basford

6 J. Ronald Brooke, Jr.

7 Joshua A. Doan

8 600 Pennsylvania Ave., NW, CC-  
9 6316/1144

10 Washington DC 20580

11 (202) 326-3043 / [tbiesty@ftc.gov](mailto:tbiesty@ftc.gov)

12 (202) 326-2343 / [lbasford@ftc.gov](mailto:lbasford@ftc.gov)

13 (202) 326-3484 / [jbrooke@ftc.gov](mailto:jbrooke@ftc.gov)

14 (202) 326-3187 / [jdoan@ftc.gov](mailto:jdoan@ftc.gov)

15 *Attorneys for Plaintiff*

16 *Federal Trade Commission*

17 /s/ Lucas J. Tucker

18 Lucas J. Tucker

19 Samantha B. Freeley

20 Office of the Nevada Attorney General

21 8945 W. Russel Road, Suite 204

22 Las Vegas, NV 89148

23 (702) 486-3256 / [jtucker@ag.nv.gov](mailto:jtucker@ag.nv.gov)

24 (702) 486-3789 / [sfeelet@ag.nv.gov](mailto:sfeelet@ag.nv.gov)

25 *Attorneys for Plaintiff*

26 *State of Nevada*

/s/ Alina Veneziano

Alina Veneziano

Oberheiden, P.C.

625 S. 6th Street

Suite #301

Las Vegas, NV 89101

(702) 209-7570 / [alina@federal-  
lawyer.com](mailto:alina@federal-lawyer.com)

*Attorneys for Defendant Alex Morton*

27  
28 STIPULATION TO EXTEND DEADLINE